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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

Mr. James Buczala  
Woodward-Clyde Consultants  
1400 Union Meeting Road  
Blue Bell, Pennsylvania 19422

August 29, 1995

Re: Geoarchaeological Evaluation and Phase IB Cultural Resources  
Work Plan, Koppers Co. Inc. Site, Newport, Delaware

Dear Mr. Buczala:

This letter forwards comments from Ms. Faye Stocum, Delaware State Historic Preservation Office (DESHPO) on the summary of resolutions letter dated July 20, 1995 from Woodward-Clyde Consultants (WWC). Please address Ms. Stocum's comments within the text of the revised Geoarchaeological Evaluation and the revised Phase IB Cultural Resource Studies Work Plan. We look forward to receiving these revised documents for review and approval on or before September 29, 1995.

Please call with any questions or comments.

Sincerely,

*Lisa M. Marino*  
Lisa M. Marino, RPM  
DE/MD Section

cc: F. Stocum, DESHPO  
M. Zhang, DNREC  
J. Patarcity, Beazer  
J. Karmazyn, DuPont

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STATE OF DELAWARE  
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August 21, 1995

Ms. Lisa Marino 3HW42  
Remedial Project Manager  
DE/ME Section  
U.S. EPA, Region III  
841 Chestnut Building  
Philadelphia, PA 19107-4431

Dear Lisa:

I have completed my review of the July 20 submission of a summary of resolutions and the revised excerpts from the Geoarchaeological Evaluation report for the Kopper Superfund project. The discussion which was held on June 13 is reflected in most resolution comments and it can only be assumed these issues will be adequately addressed in the revised documents. There are a few issues which, upon rereading my meeting notes, have not been addressed or done so adequately. The revised excerpts from the Geoarchaeological Evaluation report reflect the majority of my comments but there is the big omission of the historic archaeological resource sensitivity and potential modelling issues which we discussed during the meeting. I also have some additional comments on the revised text. I have enclosed comments on the resolution statements and the revised Geoarchaeological Evaluation text for everyone's consideration. I trust that these can be readily addressed and the appropriate revisions made so this project can go forward.

If you have any questions, please do not hesitate to contact me at your convenience. Thank you.

Sincerely,

Faye L. Stocum  
Archaeologist

Enclosure

cc: Jim Buczala  
Joel Karmazyn  
Ron Thomas  
Margie Zhang

AR308993

Comments on Summary of Resolutions and Revised Geoarchaeological Evaluation Report (excerpts) for the Koppers Superfund Property:

1. Resolution Items #1-10 for Geoarchaeological Report: All issues appear to have been addressed.
2. Resolution Item #11 for Geoarchaeological Report: While the comment indicates that the channels are not significant to the development of the model, this was not the issue raised. I requested additional text narrative to indicate why this was not the case. This requested information is in the revised text. This issue has been resolved. There appears to be some misunderstanding between the report reviser and the resolution commenter.
3. Resolution Item #12 for Geoarchaeological Report: This issue has been adequately addressed in the revised text.
4. Resolution Items #13-15 for Geoarchaeological Report: All issues appear to have been addressed.
5. Resolution Item #16 for Geoarchaeological Report: The resolution comment indicates that the islands are "...not likely to be significant locations for prehistoric sites." I strongly disagree. Moreover, the revised narrative addresses this concern. It seem that there is some misunderstanding between the report reviser and the resolution commenter.
6. Resolution Items #17-20 for Geoarchaeological Report: Item #17 appears to have been addressed.
7. Resolution Item #21 for Geoarchaeological Report: The issue raised dealt with defining terms of site **potential not site sensitivity** (pages 27 and following, plus Table 4 of original draft report). I didn't have a problem with the discussion on pages 20 and following or with Table 3. Under the *Prehistoric Archaeological Site Potential* Section and Table 4, the problem with using the term "negligible" has been resolved; however, the solution itself creates another problem. What does "Very Low" mean? This is not defined in the text (Oddly enough it is at least partially defined in Resolution comment #23.) This shift in terminology hasn't resolved the original need for definitions in this section of the report.
8. Resolution Item #22-23 for Geoarchaeological Report: All issues appear to have been addressed.
9. Resolution Item #1 for Work Plan: It is assumed that this issue will be adequately addressed.
10. Resolution Item #2 for Work Plan: It is assumed that this issue will be addressed in the revised Work Plan. It should be noted that only identifying "high potential areas" is not sufficient. Map(s) references should be included in text as needed. Historic archaeological sensitivity and site potential must be treated the same as prehistoric archaeological sites. The

AR308994

Comments on Summary of Resolutions and Revised Geoarchaeological Evaluation Report (excerpts) Continued:

rationale (theoretical constructs) upon which the sensitivity and potential for these sites is based must be included in the Geoarchaeological Evaluation Report as well as the Work Plan. The revised Geoarchaeological Evaluation report (revised excerpts) does not include this information.

11. Resolution Item #3 for Work Plan: It is assumed that this issue will be adequately addressed.

12. Resolution Item #4 for Work Plan: The location map depicting areas which will be surveyed (coinciding with Remedial Action) is very helpful. It should be noted that the original Figure #13 upon which this information is presented was revised for the Geoarchaeological Evaluation report. That revised figure should be used. The consultant will adequately sample the "Kopper Proper" area (treatment and storage areas) to ensure that the degree of disturbance which is assumed (to be great) is true. This did not include other "negligible potential areas" primarily because there was no adequate definition of what this category meant. I reiterate, there is a great deal of confusion with terminology and until that is resolved, this testing assumption regarding negligible potential areas will not be commented upon.

13. Resolution Item #5 for Work Plan: This proposed resolution is acceptable on the assumption the provided necessary rationale behind historic site sensitivity and site potential make it inappropriate to generate separate maps.

14. Resolution Items #6-8 for Work Plan: All issues appear to have been addressed.

15. Resolution Item #9 for Work Plan: This alternative will be acceptable.

16. Resolution Items #10-11 for Work Plan: All issues appear to have been or will be addressed.

17. Resolution Item # 12 for Work Plan: The year in which the SHPO survey Guidelines were prepared is 1993 not 1994.

18. Revised Geoarchaeological Evaluation Excerpts: The definition of site needs additional attention. It must include historic as well as prehistoric occupations and it should be identified as being within an archaeological context..

19. Revised...Excerpts/Introduction: The initial paragraphs do not address the historic archaeological resource sensitivity and potential of the project area. Likewise, additional text is needed to address this issue thoroughly. (See comment #10.)

20. Revised...Excerpts/Prehistoric Archaeological Site Sensitivity: Medium

AR308995

Comments on Summary of Resolutions and Revised Geoarchaeological Evaluation Report (excerpts) Continued:

sensitivity must be clarified to be between 100 and 200 meters; otherwise, medium and low sensitivity areas partially overlap.

21. Revised...Excerpts/Refined Prehistoric Site Sensitivity Model: Where is Figure 10? Is it available for review? What does "intermediate sensitivity areas" mean? Is this a revised and defined term explained elsewhere or the use of a term which will only adds to the existing confusion surrounding undefined terms?

22. Revised... Excerpts/Attached Figure 13 (twice): The first Figure 13 shows the revised areas of resource potential revisiting the distance from water issue. Are the categories of site potential listed in the legend defined in the text? The second Figure 13 which identifies the areas where remedial activities are slated to occur needs to be looked at. It uses the old Figure 13 not the revised one. (See comment #12.)

AR308996